

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

In re:

CINDY D. TIPTON,

Debtor.

No. 16-00701

JUDY A. ROBBINS, United States Trustee
for Region Four,

Movant,

v.

PRINCE LAW, LLC (a/k/a PRINCE LAW,
LLP),

Respondent.

**MOTION FOR ADMISSION *PRO HAC VICE*
FOR BRIAN L. SHAW AND ROBERT M. FISHMAN**

Pursuant to Local Bankruptcy Rule 2090-1(E)(2), Christopher W. Stevens ("Movant"), a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Western District of Virginia, files this motion with the Court requesting entry of an Order permitting the admission of Brian L. Shaw of the law firm of Shaw Fishman Glantz & Towbin LLC to appear and practice *pro hac vice* on behalf of Darren Delafield and Upright Law, LLC, non-parties, in relation to the pending Motion of Non-Parties Darren Delafield and Upright Law, LLC for Entry of Protective Order as to, or for Order Modifying, Subpoena *Ad Testificandum* Issued by United States Trustee and in any deposition or other hearing in which Mr. Delafield may be called to testify in this bankruptcy case and related adversary proceeding. In support of this Motion, Movant states as follows:

1. Brian L. Shaw is a member in good standing of the Illinois State Bar and is admitted to the United States District Courts for the Northern and Central Districts of Illinois, Eastern District of Wisconsin, Northern District of Indiana and Western District of Michigan, the Third, Seventh and Eighth Circuit Courts of Appeal and the United States Supreme Court. There

are no disciplinary proceedings pending against him in any jurisdiction in which he is admitted to practice.

2. Mr. Shaw has read and shall be governed by the Local Rules of this Court, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the Federal Rules of Bankruptcy Procedure.

3. A true and accurate copy of a Declaration in Support of Motion for Admission to Practice Pro Hac Vice Under Local Bankruptcy Rule 2090-1(E)(2) for Mr. Shaw is attached hereto as **Exhibit A**.

WHEREFORE, pursuant to Local Bankruptcy Rule 2090-1(E)(2), Movant respectfully requests entry of an Order, substantially similar to the proposed order attached hereto as **Exhibit B** authorizing Brian L. Shaw to appear *pro hac vice* on behalf of Darren Delafield and Upright Law, LLC, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

By: /s/ Christopher W. Stevens

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Counsel for Darren Delafield

WOODS ROGERS PLC
ATTORNEYS AT LAW

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on the 26th day of September, 2016, the foregoing was filed electronically with the United States Bankruptcy Court and was served electronically on those parties who are CM/ECF participants, emailed to Cindy D. Tipton, and by U.S. Postal service to the addresses listed below:

Prince Law, LLC
David L. Prince, Registered Agent
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Prince Law, LLC
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Plantation, FL 33317

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/s/ Christopher W. Stevens